

Document Log Item

Addressing	
From	To
Carl Goldstein/R9/USEPA/US	"Brad Rea" <rea.brad@gmail.com> "Brad Rea" <rea.brad@gmail.com>
CC	BCC
	pjp617@uow.edu.au
Description Form Used: Reply	
Subject	Date/Time
Re: Requirement for RP backflow assembly on Samoa Packing Co. service line	07/26/2007 12:21 PM
# of Attachments	Total Bytes
0	13,620
NPM	Contributor
	Marcela VonVacano
Processing	
Comments	

Body

Document Body

Brad,

Hmm, very interesting concerning COS. You will have made an incredible impression in the AS culture and society by single handedly taking the economy to where it belongs by driving out one of the canneries.

Regarding COS, I suggest you also inform a gentleman by the name of Jim Cox. You can let Jim know about this issue and send him the same email that you sent Ken and by way of introduction tell Jim that you are keeping him informed at my request. Jim is their on-staff engineering consultant located in San Diego.

jcox@cosintl.com

Regarding StarKist, I recommend that you do wait until Joe returns and take the matter up with him. However, you may wish to go on record with StarKist at this time by sending an email to Brett Butler, the GM for StarKist, and Joe Carney. Brett will either forward the issue to his HQ or have one of his men contact you but I suspect he would like to seek the knowledge and advice of Joe, so that is why I recommend you wait until Joe returns. Joe Carney is in the Philippines on vacation, and Joe is the man for these matters, and he is a good man.

brett.butler@delmonte.com
joe.carney@delmonte.com

Yes indeed, lets see where COS goes with this, and what StarKist has to say. As a reminder, I will be in AS Aug 12 -19.

-Carl

"Brad Rea" <rea.brad@gmail.com>

"Brad Rea" <rea.brad@gmail.com>

07/26/2007 11:55 AM

To: Carl Goldstein/R9/USEPA/US@EPA
cc: "Edna Buchan" <ebuchan2@gmail.com>
Subject: Re: Requirement for RP backflow assembly on Samoa
Packing Co. service line

Carl,

As recently as mid-June Starkist, Samoa Packing, and Impress were all notified by ASPA, and indirectly by myself as cc's on a letter to ASPA, that they need to come into compliance on the backflow issue. To date, the silence of their respective and combined responses has been deafening. The principle Starkist contact is said to be off-island on vacation until sometime in August, and I am not sure what is keeping Impress from responding. I finally coerced a return phone call from Ken McLeod at Samoa Packing just yesterday. Ken stated that this additional

expense may cause his superiors to pull the plug and leave AS at the first of the year. If this issue serves as the determinant for such a decision, then they really are in trouble!

I have obtained the name of another individual at Starkist who may be able to respond, but believe it or not they do not answer their phones... no matter what number I call over there I do not get an answer, not even a recording.

I'll let you know as I learn more.

Brad

On 7/26/07, Goldstein.Carl@epa.gov <Goldstein.Carl@epa.gov> wrote:
Excellent work. What about StarKist?

"Brad Rea"
<rea.brad@gmail.com> To
"Ken McLeod at Samoa Packing"
07/25/2007 06:22 <kmcleod@sampac.com>
PM cc
"Menorah Sopoaga"
<menorah@aspower.com>, "Ryan
Tuatoo" <rtuatoo@gmail.com>,
"Andra Samoa"
<andras@aspower.com>, "Reno
Vivao" <reno@aspower.com>,
"Ne'emias Mareko"
<neemiam@aspower.com>, "Edna
Buchan" <ebuchan2@gmail.com>,
Carl Goldstein/R9/USEPA/US@EPA
Subject

Requirement for RP backflow
assembly on Samoa Packing Co.
service line

Hello Ken,

Thank you for returning my call this morning. In answer to your request for clarification and documentation of the requirement for backflow prevention assemblies to be installed at the American Samoa Packing Company facility, I am attaching a copy of the USEPA Cross-Connection Control guidance manual and a copy of ASAC 25 Chapter 4 of the American Samoa Administrative Code.

ASAC 25.0405 deals specifically with local backflow prevention policy. I further refer you to ASAC 25.0405(5)(a) which authorizes American Samoa Power Authority (ASPA) to require the installation of appropriate backflow prevention equipment as a condition of service .

Also attached are files of specific text from AWWA Manual M14 "Recommended Practice for Backflow Prevention and Cross-Connection Control" and from the ninth edition of "Manual of Cross-Connection Control" as published by The Foundation for Cross-Connection Control and Hydraulic Research at the University of Southern California. Each of these manuals is essentially a U.S. standard of professional reference concerning backflow and cross-connection control. Further, both manuals stipulate that either an approved air-gap or an approved reduced pressure (RP) backflow assembly be installed to isolate a commercial cannery operation from a public water supply distribution system.

Please be aware that an RP assembly cannot be installed in a below grade pit. In addition, the assembly must be accessible for annual testing, and thus no part of the assembly shall be placed lower than one-foot above grade, or a platform, and no part of the assembly may be higher than six-feet above grade, or a platform.

ASEPA considers backflow prevention to be a very high priority drinking water issue. You are therefore requested to provide ASPA's Drinking Water Compliance Officer, Menorah Sopoaga, and myself with a plan and a schedule for how Samoa Packing Company intends to proceed with meeting regulatory compliance for backflow isolation from the ASPA distribution system. Receipt by ASEPA of that plan and schedule from Samoa Packing within two-weeks would be helpful toward resolving this non-compliance event.

I appreciate your cooperation on this issue. The integrity of the ASPA drinking water supply, the public health of all who reside in American Samoa, and Territorial/U.S. regulations require that actual and potential backflow incidences be avoided through the use of carefully engineered systems and common sense.

If you have any further questions, please feel free to contact me at your soonest convenience. I am also available to pre-approve your assembly selection and installation plans so that costly purchasing errors may be avoided.

Sincerely,

Brad

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CDR Brad Rea, P.E.
U.S. Public Health Service Engineer
Special Assistant to the Director
American Samoa EPA

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e-mail: rea.brad@gmail.com (See attached file: BF-CC AWWA M14.pdf)(See attached file: FCCCHR-USC ED9.pdf)(See attached file: BF-CC AWWA M14.pdf)(See attached file: FCCCHR-USC ED9.pdf)

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